

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : INDICTMENT
:
- v. - : 22 Cr.
:
:

OKAMI LANDA,
Defendant.

24 Crim 590
:
:
x

COUNT ONE
(False Information and Hoaxes)

The Grand Jury charges:

1. In or about November 2021, in the Southern District of New York and elsewhere, OKAMI LANDA, the defendant, knowingly engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably be believed and where such information indicated that an activity had taken, was taking, or would take place that would constitute a violation of Chapters 10 and 113B of Title 18, United States Code, to wit, LANDA mailed a threatening letter to a Special Agent of the Federal Bureau of Investigation ("FBI") at an FBI office in Manhattan, New York that contained a white powder substance and a statement about the Special Agent and his family contracting a "terminal disease to end your sorry life," prompting an emergency response that included the precautionary hospitalization and quarantine of the Special Agent and other FBI

employees exposed to the powder, which subsequently tested negative for biological agents or toxins.

(Title 18, United States Code, Sections 1038(a)(1) and 2.)

COUNT TWO
(Possession of Child Pornography)

The Grand Jury further charges:

2. From at least in or about April 2020, up to and including in or about November 2021, in the Southern District of New York and elsewhere, OKAMI LANDA, the defendant, knowingly did possess and access with intent to view, and attempt to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material containing an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, LANDA possessed images and videos of child pornography that included images of prepubescent minors and minors who had not attained 12 years of age on a USB flash drive at his residence located in the vicinity of the Bronx, New York.

(Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2), and 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count Two of this Indictment, OKAMI LANDA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any visual depiction described in the offense set forth in Count Two, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code, and any and all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from said offense and any and all property, real or personal, used or intended to be used to commit or promote the commission of said offense or traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2253; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON



DAMIAN WILLIAMS
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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v.

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Defendant.

INDICTMENT

22 Cr.

(18 U.S.C. §§ 1038(a)(1),
2252A(a)(5)(B), (b)(2), and 2.)

DAMIAN WILLIAMS

United States Attorney

Mark E. Stern

Foreperson

True Bill & Indictment. 10/27/22 AD

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